

EXHIBIT 14

From: Michael Bloch
Sent: Sunday, January 26, 2020 4:51 PM
To: MILO
Subject: RE: Reduced scope of subpoena

Milo,

I'm willing to keep working with you and accommodating your efforts to review and produce documents to us, but it has been nearly two months since our initial compliance date listed on the subpoena. When we met in New York, you represented to us that you had audio recordings of planning sessions related to Unite the Right, which are obviously highly relevant to our litigation and fall within the scope of our subpoena. At a minimum, it should not be too burdensome to produce those recordings. We extended the compliance date to January 17 for those recordings as well as documents concerning communications you had with the defendants in our case based on your representations that you were interested in voluntarily complying with the subpoena. Assuming that is still your intention, I am willing to extend the date for your compliance a final time to this Friday, January 31. Beyond that, we will need to take steps to enforce the subpoena. As always, I'm available to discuss anytime.

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mbloch@kaplanhecker.com

From: MILO <m@milo.net>
Sent: Saturday, January 25, 2020 12:21 AM
To: Michael Bloch <mbloch@kaplanhecker.com>
Subject: Re: Reduced scope of subpoena

Hi Michael. Thanks for the update. So far I've spent \$3,500 on travel and associated expenses to review materials on your behalf. But many questions remain about the FBI's desire to acquire them exclusively.

I am meeting my contacts at the Bureau next week in person and will be in a better position to answer you after that. As I'm sure you will understand I have been obliged to prioritize federal law enforcement over your civil action.

On Fri, Jan 24, 2020 at 20:36 Michael Bloch <mbloch@kaplanhecker.com> wrote:

Milo, I'm concerned I haven't heard from you and it is now a week beyond the date we allowed for compliance with the subpoena. Please let us know the status of your production.

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From: Michael Bloch
Sent: Monday, January 20, 2020 1:59 PM
To: MILO <m@miло.net>
Subject: RE: Reduced scope of subpoena

Milo,

The date we discussed for your production (January 17) has passed. I'm available to discuss if you have questions. Please let us know the status of your production. Thanks.

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From: Michael Bloch
Sent: Thursday, January 9, 2020 9:53 PM
To: MILO <m@miло.net>
Subject: RE: Reduced scope of subpoena

Milo,


Please see attached. Sorry for the delay.

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From: MILO <m@miло.net>
Sent: Tuesday, December 31, 2019 4:38 PM

To: Michael Bloch <mbloch@kaplanhecker.com>

Subject: Re: Reduced scope of subpoena

Thanks, Michael. This is sufficient but we would be more comfortable with it on your letterhead via PDF, or, failing that, an assurance that a copy has been sent by mail. 

On Tue, Dec 31, 2019 at 2:04 PM Michael Bloch <mbloch@kaplanhecker.com> wrote:

Thanks Milo. As we discussed, we are happy to narrow the scope of the subpoena based on your representations of what is less burdensome for you to collect. To that end, we are requesting all audio and visual recordings that you have in your possession relating to the Unite the Right event that took place in Charlottesville, Virginia on August 11 and 12, 2017, and which were recorded in Virginia. We would be happy to discuss with you the scope and content of whatever other recordings you have in your possession that you believe relate to Unite the Right. Additionally, we are requesting any other communications between you and any of the Defendants in Sines v. Kessler that relate to Unite the Right.

We are requesting that these recordings and documents be produced to us by January 17, 2020.

Please let us know if you have any questions or if you would like to discuss further clarification of our request. We are also happy to discuss further any logistics regarding the collection and production.

Michael

From: MILO <m@milo.net>

Sent: Sunday, December 29, 2019 12:02 PM

To: Michael Bloch <mbloch@kaplanhecker.com>

Subject: Reduced scope of subpoena

Dear Michael,

Just checking on the status of the letter we discussed on production scope. I am happy to accept a PDF via email with a paper copy sent by mail. Alternatively an amended subpoena would be fine.

We agreed on a deadline that expires in a few days, and I will be producing a summary of materials in compliance with our new understanding. But I want to be protected before I do so. Therefore please understand that I will require a copy of the letter or amended subpoena before we can proceed further.

Thanks,

Milo



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